

LITE DEPALMA GREENBERG, LLC

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*Local Counsel for Lead Plaintiff
Dr. Stanley Golovac*

MOTLEY RICE LLC

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*Lead Counsel for Lead Plaintiff Dr. Stanley
Golovac and Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, Individually and on	:	
behalf of all others similarly situated,	:	Civil Action No.: 18-2293(FLW)(ZNQ)
	:	
<i>Plaintiff,</i>	:	
	:	
v.	:	
	:	
RIOT BLOCKCHAIN, INC. F/K/A,	:	
BIOPTIX, INC., JOHN O'ROURKE, and	:	
JEFFREY G. MCGONEGAL,	:	
	:	
<i>Defendants.</i>	:	
	:	

**LEAD PLAINTIFF'S NOTICE OF MOTION FOR LEAVE TO FILE [PROPOSED]
CONSOLIDATED SECOND AMENDED CLASS ACTION COMPLAINT FOR
VIOLATIONS OF THE FEDERAL SECURITIES LAW**

PLEASE TAKE NOTICE that on July 6, 2020 at 9:00 am, or as soon thereafter as counsel may be heard, Lead Plaintiff, will move before Honorable Freda L. Wolfson, U.S.D.J., at the United States District Court for the District of New Jersey, Clarkson S. Fisher Federal Building and Courthouse, Room 5050, 402 East State Street, Trenton, New Jersey, for an Order

pursuant to Rules 15(a) of the Federal Rules of Civil Procedure, granting leave to file a Second Amended Complaint.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Plaintiff will rely upon the accompanying memorandum of law and Declaration of Joseph J. DePalma. A proposed form of Order is also submitted herewith.

LITE DEPALMA GREENBERG, LLC

Dated: June 1, 2020

/s/ Joseph J. DePalma

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Counsel for Lead Plaintiff Dr. Stanley Golovac

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send a Notice of Electronic Filing to all counsel of record.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 1, 2020.

/s/ Joseph J. DePalma

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